



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911
(513) 285-6357
FAX (513) 285-6249

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George V. Voinovich
Governor

May 13, 1998

RE: DOE FEMP
COMMENTS: A2 PI IRDP

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

Dear Mr. Reising:

Ohio EPA has reviewed DOE's April 8, 1998 submittal, "Transmittal of Revised Integrated Remedial Design Package for Area 2, Phase 1 Southern Wastes Units." Attached are Ohio EPA's comments on the document.

If you have any questions, please contact me.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA
Terry Hagen, FDF
Ruth Vandergrift, ODH
Mark Shupe, HSI GeoTrans
Francie Barker, Tetra Tech EM Inc.
Manager, TPSS/DERR,CO

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Ohio Environmental Protection Agency comments on the
Revised Area 2 Phase I Southern Waste Units Integrated Remedial
Design Package

Response to Comments Package

- 1) Commenting Organization: OEPA Commentor: OFFO
 Section #: Pg. 8 Line # Code: C
 Original Comment # 6
 Comment: a) The second paragraph of the response refers to the CDL being completed in 2001 with certification being completed in 2000. Obviously the CDL must be submitted prior to initiating certification. Please revise accordingly.
 b) The response also discusses backfilling Basin #2 but provides not basis for backfilling this basin. No justification could be found in the IRDP either. Please provide additional basis for this decision. The non-impacted soil may be best used for other grading/revegetation in the area.

- 2) Commenting Organization: OEPA Commentor: OFFO
 Section #: Pg. 9 Line # Code: C
 Original Comment # 11
 Comment: Obviously, based upon recent storm events the basins, in particular Basin #2, are not successful in meeting the criteria discussed. Ohio EPA expects DOE will be submitting appropriate design changes to ensure the basins meet the design criteria.

- 3) Commenting Organization: OEPA Commentor: OFFO
 Section #: Pg. Line # Code: C
 Original Comment # 13
 Comment: Ohio EPA was unable to locate the referenced "explanation of geostatistical modelling" within Appendix D. Please clarify.

- 4) Commenting Organization: OEPA Commentor: OFFO
 Section #: Pg. 15 Line # Code: C
 Original Comment # 30
 Comment: Due to the fact that unexpected above-WAC materials were encountered during the excavation of materials in the SWU and that no approved methods for post removal characterization of such areas existed, Ohio EPA believes the impacted material stockpile should be excavated using both real-time monitoring (RTRAK) and visual identification for above WAC material.

- 5) Commenting Organization: OEPA Commentor: OFFO
 Section #: Pg. 18 Line # Code: C
 Original Comment # 39
 Comment: Ohio EPA disagrees with the proposed method for installation of the sumps. The proposed method is not sufficiently protective of the aquifer and will likely result in release of

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additional contaminants into the ground water thus extending remediation time frames. DOE should require the contractor to line the excavation sump with HDPE whenever the excavation is within 1 foot of the GMA, i.e., any excavation below 551' msl will have a sump lined with HDPE.

- 6) Commenting Organization: OEPA Commentor: OFFO
 Section #: Pg. 37 Line # Code: C
 Original Comment # 94
 Comment: The response and action discuss use of SP-5 but fail to address the original comment regarding details on how trucks leaving the above-WAC pile will be decontaminated. Please provide additional detail on how decontamination will be accomplished.

Implementation Plan

- 7) Commenting Organization: OEPA Commentor: OFFO
 Section #: Executive Summary Pg #: ES-2 Line #: 23 Code: c
 Comment: The document references both SP-5 and SP-7 in a number of locations without presenting a sufficient discussion of the basis for a name change to the pile. Please include brief discussion on the basis for the change.
- 8) Commenting Organization: OEPA Commentor: OFFO
 Section #: 3.1.7.6 Pg #: 3-8 Line #: 8-11 Code: c
 Comment: Ohio EPA approval of the installation of the chain link fence was not "in lieu of the infiltration barrier" but simply a best management practice to protect the aquifer. Ohio EPA concurred with the use of only an HDPE liner as the best of two bad choices resulting from a combination of construction sequencing and weather. Choosing to protect the aquifer from continued infiltration through the unlined basin over waiting for acceptable weather to place the clay liner. Additionally, Ohio EPA only concurred based on the agreement, that, if it was found the basin wasn't being sufficiently protective that additional actions would be taken to prevent infiltration and that water collected from the basin would be removed as quickly as possible to prevent continued head on the liner. The document must be revised to state the fence is not "in lieu of an infiltration barrier" and that additional actions at Basin #2 may be required if it is found to be insufficiently protective.
- 9) Commenting Organization: OEPA Commentor: OFFO
 Section #: 3.1.7.6 Pg #: 3-9 Line #: 8-10 Code: c
 Comment: Ohio EPA does not believe this is an acceptable approach to characterizing sediments. Characterization after removal and placement elsewhere is not appropriate. Ohio EPA recommends collecting physical samples for waste characterization prior to any removal.

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Additional detail on sediment removal should be provided in this document or a future document for such detail should be provided.

- 10) Commenting Organization: OEPA Commentor: OFFO
Section #: 3.3.2.2 Pg #: 3-17 Line #: 15-16 Code: c
Comment: The addition of bulk storage for lead contaminated soils is a new addition to the design. If DOE intends to propose bulk storage, then the design must be revised to provide details regarding how RCRA compliant storage will be conducted (e.g., liner design, location, duration, etc.). Otherwise storage in containers on an approved RCRA storage pad is the only acceptable method.
- 11) Commenting Organization: OEPA Commentor: OFFO
Section #: 3.3.2.6 Pg #: 3-20 & 21 Line #: 28-6 Code: c
Comment: Ohio EPA disagrees with the proposed method for installation of the sumps. The proposed method is not sufficiently protective of the aquifer and will likely result in release of additional contaminants into the ground water thus extending remediation time frames. DOE should require the contractor to line the excavation sump with HDPE whenever the excavation is within 1 foot of the GMA, i.e., any excavation below 551' msl will have a sump lined with HDPE.
- 12) Commenting Organization: OEPA Commentor: OFFO
Section #: 3.6.1 Pg #: 3-32 Line #: 28-6 Code: c
Comment: Ohio EPA believes it is most appropriate to use a permanent seeding mixture rather than interim seeding. This is based upon the fact that the permanent seeding mixture presents a better erosion control mixture and would be consistent with any restoration approach. The area will be undisturbed for approximately two years or more prior to restoration providing additional justification for use of permanent seeding mixture. It is likely that mulching will not be sufficient for some of the slopes remaining after interim grading thus necessitating the use of an erosion control blanket.
- 13) Commenting Organization: OEPA Commentor: OFFO
Section #: Table 6-5 Pg #: 6-29 Line #: Code: c
Comment: The table should be revised to include the A2P1 Non-waste Unit Areas CDL as an enforceable milestone.

Storm Water Management Plan

- 14) Commenting Organization: OEPA Commentor: OFFO
Section #: App. B; 2.2.7 Pg #: 2-7 Line #: Code: c

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Comment: The proposed text revision is unacceptable. The Equipment Wash Facility must be operated in a manner such that the capacity of the lift station is not exceeded.

- 15) Commenting Organization: OEPA Commentor: OFFO
 Section #: App. B; 4.2.4 Pg #: 4-3 Line #: Code: c
 Comment: The revised text is inadequate. The text should be revised to state that stabilization is required for any area that will be idle for 45 days or more. Stabilization must be initiated within 7 days.

A2P1 Data Summary

- 16) Commenting Organization: OEPA Commentor: OFFO
 Section #: App. D; Pg #: Line #: Code: c
 Comment: Ohio EPA was under the impression that DOE would be completing a 100% RTRAK coverage of the SWU area prior to starting excavation. Is this still planned? If so when will it be completed?
- 17) Commenting Organization: OEPA Commentor: OFFO
 Section #: App. D; 1.1.2.2 Pg #: D-7 Line #: 1-12 Code: c
 Comment: The document discusses results of COC statistical evaluation but provides no data tables summarizing the results and statistical analysis. Please include tables of statistical analysis for the certified for reuse areas.
- 18) Commenting Organization: OEPA Commentor: OFFO
 Section #: App. D; 1.2.2 Pg #: D-11 Line #: 9-10 Code: c
 Comment: Figure D-37 does not include the data referenced in lines 2-3. The figure does not show the data point where the scan was < 100 ccpm but > 1030 mg/kg. The figure should be revised to include all available data.
- 19) Commenting Organization: OEPA Commentor: OFFO
 Section #: App. D; 1.2.2 Pg #: D-11 Line #: 15-17 Code: c
 Comment: This line would appear to be in direct conflict with line 2-3 above, where it states that one sample had < 100 ccpm but > 1030 mg/kg. Please clarify.
- 20) Commenting Organization: OEPA Commentor: OFFO
 Section #: App. D; 1.2.2 Pg #: D-13 Line #: 1-10 Code: c
 Comment: Ohio EPA does not believe the data presented sufficiently bound the area of above WAC contamination. We are aware of additional data being collected since this document was drafted. The new data and associated changes to the remediation approach should be included in

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the document or an attachment to it.

Technical Specifications

- 21) Commenting Organization: OEPA Commentor: OFFO
 Section #:Spec. 02212 Pg #: Line #: Code: c
 Comment: Specification 02212 from the draft IRDP has been removed. Justification for removal of the spec should be provided or the spec included.
- 22) Commenting Organization: OEPA Commentor: OFFO
 Section #:Spec. 02205; 3.4F Pg #: 16-17 Line #: Code: c
 Comment: a) See previous Ohio EPA comment regarding use of HDPE lined sumps when excavating within 1' of the GMA.
 b) Ohio EPA disagrees with the text revisions made to this section on page 17. Any change to liner material requires agency approval.
- 23) Commenting Organization: OEPA Commentor: OFFO
 Section #:Spec. 02205; 3.6E Pg #: 20 Line #: Code: c
 Comment: Additional detail regarding drainage controls for SP-5 should be included. A design drawing should also be included.
- 25) Commenting Organization: OEPA Commentor: OFFO
 Section #:Spec. 02275; 3.1B Pg #: 7 Line #: Code: c
 Comment: Ohio EPA disagrees with the text revisions made to this section. Any change to liner installation detail requires agency approval.
- 26) Commenting Organization: OEPA Commentor: OFFO
 Section #:Spec. 02275; 3.4 Pg #: Line #: Code: c
 Comment: Ohio EPA has concerns with the specification as written. The specification should be revised to be consistent with Ohio EPA's comments below regarding the 5/14/98 version of specification 02900.
- 27) Commenting Organization: OEPA Commentor: OFFO
 Section #:Spec. 02900 Pg #: Line #: Code: c
 Comment: Ohio EPA has significant concerns with the specification as written. Rather than provide extensive comments on the 02900 incorporated in this document. Ohio EPA received an updated version from Craig Straub on May 14, 1998. The following comments are in regard to the 02900 provided on May 14, 1998.

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- 28) Commenting Organization: OEPA Commentor: OFFO
Section #: 5/14/98 02900; 1.4.C Pg #: Line #: Code: c
Comment: Text should be added to state that the plan shall be subject to review and concurrence from the Natural Resources group of FDF.
- 29) Commenting Organization: OEPA Commentor: OFFO
Section #: 5/14/98 02900; 2.1.D Pg #: Line #: Code: c
Comment: The document should incorporate a statement requiring the contractor to complete either interim (B) or permanent (C) seeding during the next seeding window following application of Buckwheat.
- 30) Commenting Organization: OEPA Commentor: OFFO
Section #: 5/14/98 02900; 2.1.G Pg #: Line #: Code: c
Comment: The text should be revised to state, "Ohio EPA has determined that straw/mulch application activities are exempt from fugitive dust control requirements. It is expected that good practices will be used to ensure unacceptable quantities of straw or seed are not blown away."
- 31) Commenting Organization: OEPA Commentor: OFFO
Section #: 5/14/98 02900; 3.1.A Pg #: Line #: Code: c
Comment: To be consistent with the *Rainwater and Land Development* guidance the text should be revised to state, "Stabilization of disturbed areas by seeding or by use of crusting agent shall be performed at completion of excavation or within seven (7) calendar days of knowing a disturbed area will be idle for more than 45 days, whichever is sooner."
- 32) Commenting Organization: OEPA Commentor: OFFO
Section #: 5/14/98 02900; 3.1.D Pg #: Line #: Code: c
Comment: To provide additional clarity, revise the text to state, "Disturbed areas and soil piles which are scheduled to be significantly disturbed within 2 years, are destined for the OSDF, and/or need effective erosion control immediately. are to be stabilized...."
- 33) Commenting Organization: OEPA Commentor: OFFO
Section #: 5/14/98 02900; 3.2A Pg #: Line #: Code: c
Comment: The text should be revised to state the Construction Manager will consult with the Natural Resource group of FDF and Ohio EPA prior to directing or approving such changes.
- 34) Commenting Organization: OEPA Commentor: OFFO
Section #: 5/14/98 02900; 3.2C Pg #: Line #: Code: c
Comment: Previous versions of the specification required a higher seed rate when using a

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hydroseeder. Ohio EPA recommends incorporation of an additional bullet stating that if using hydroseeding a 50% higher seed application rate is required.

- 35) Commenting Organization: OEPA Commentor: OFFO
Section #: 5/14/98 02900; 3.3 Pg #: Line #: Code: c
Comment: The section does not include a discussion of the need to conduct maintenance of areas using the crusting agent. Crusting agents must be maintained to ensure proper erosion control. Additional detail on maintenance should be included.